REMARKS/ARGUMENTS

Claims 1and 5 are the independent claims. Claims 1-5 are amended. New claim 6 is added. Claims 1-6 are pending in the application. Reexamination and reconsideration of the application, as amended, are respectfully requested.

Support for the claim amendment can be found in applicant's specification. See, for example, one embodiment of the present invention at page 7, line 4 – page 9, line 15, page 11, line 8 – page 12, line 9 and FIGS. 1 and 7. In this embodiment, base station devices 2(a1) and 2 (a2) form a subnet (applicant's specification page 8, line 18 – page 9, line 4). The base station device 2(a) communicates with a mobile station device 1, which may be a PHS terminal or a mobile phone (page 7, lines 12-20). The mobile station device 1 transmits a position registration request signal to the base station device 2 (applicant's specification page 10, line 8 – page 11, line 7; FIG. 9). The exemplary system is a VoIP system, and the mobile station device 1 communicates with an other communication device (including devices connected to the network via a landline or a mobile device; here, the other communication device is mobile station devices) via the base station device 2(a), router 7(a), and network 3 (a WAN network)(applicant's specification page 7, lines 4-11; page 11, line 8 – page 13, line 9, FIG. 1). To make a simultaneous call, a mobile station device issues a transmission request with the destination telephone number (the "mobile station device specifying number" in claim 2; page 11, line 8 – 16 and FIG. 9(c)). A SIP server reads the IP address of a subnet associated with the destination phone number and calculates a broadcast address of the subnet, then transmits to the broadcast address (page 11, line 16 – page 12, line 6). The simultaneous call transmission is received by all the base station devices in the subnet (id.; page 9, lines 2-4). No new matter is added.

CLAIM REJECTIONS - 35 U.S.C. § 102

Claims 1-5 stand rejected under 35 U.S.C. § 102(b) as being unpatentable over Ishii (U.S. Patent No. 6,542,935). Claims 1-5 are amended. Applicant traverses the rejection as to the amended claims

Amended claim 1 is as follows:

> A mobile body communication system, comprising:
> a subnet with a plurality of base station devices, one of base station devices receives a position registration request signal transmitted from a mobile station device and communicates with a network, and the mobile station device communicates with an other communication device via the base station device and said network; and
> simultaneous call means for transmitting a call signal to a broadcast address corresponding to said subnet when calling the mobile station device in communication with the at least one base station device.

Applicant respectfully submits that Ishii cannot anticipate amended claim 1 because Ishii does not teach or suggest all the limitations required by amended claim 1. Specifically, Ishii does not teach or suggest a mobile body communication system having "a subnet with a plurality of base station devices, one of base station devices receives a position registration request signal transmitted from a mobile station device and communicates with a network, and the mobile station device communicates with an other communication device via the base station device and said network" as required by present claim 1. Ishii also does not teach or suggest "simultaneous call means for transmitting a call signal to a broadcast address corresponding to said subnet when calling the mobile station device in communication with the at least one base station device" as required by claim 1.

As a threshold matter, applicant submits that Ishii fails to teach or suggest the "mobile station device" and limitations related thereto, as required by claim 1.

Applicant's specification provides that the mobile station device may be a PHS (personal handy-phone system) or a mobile phone. Ishii, on the other hand, is directed at an IP-based communication system and a method for obtaining an unique IP address for a device on the system (Abstract). The Office Action, at p. 2, identifies the endpoint A 202 and endpoint B 210 as the mobile station device (FIG. 2). However, Ishii does not teach or suggest the endpoint devices 202 and 210 are mobile station devices And the Office Action appears to identify the gatekeeper 212 as the base station device, that forms a subnet with the endpoint A 202. Since claim 1 requires a subnet with a plurality of base station devices and Ishii does not teach two gatekeepers forming a net (FIG. 2), Ishii again fails to satisfy the requirements of claim 1.

Moreover, Ishii does not teach or suggest one of base station devices receiving a position registration request signal transmitted from a mobile station device, as required by claim 1. As noted above, Ishii does not teach or suggest that the endpoint A 202 and endpoint B 210 are mobile devices. The "position registration" would be meaningless to the endpoint A 202 and endpoint B 210 of Ishii, accordingly.

One aspect of present invention is directed performing the position registration of a mobile device to a base station and the steps of a simultaneous call prior to establishing an end-to-end communication. The simultaneous call area is established by the position registrations such that the position registration area corresponds to the simultaneous call area. Such advantages and aspects of present invention are not seen to flow from Ishii.

Furthermore, the gatekeeper 212 is not a "base station device" required by claim 1. Claim 1 requires that the mobile station device communicates with an other communication device via the base station device and the network. The

gatekeeper 212 of Ishii provides the broadcast IP address of the destination device endpoint A 202 and the "nick" identifying the destination device to the transmission device endpoint B 210 (col. 6, lines 17-20). However, the endpoint B 210 and the destination device endpoint A 202 communicate via the IP network 204 and router 208; the gatekeeper 212 is not part of the communication (col. 6, lines 20-39). In contrast, the exemplary system is a VoIP system, and the mobile station device 1 communicates with other mobile station devices (or devices connected to the network via a landline) via the base station device 2(a), router 7(a), and network 3 (a WAN network)(applicant's specification page 7, lines 4-11; page 11, line 8 – page 13, line 9, FIG. 1). Ishii thus does not teach or suggest the "base station device" and the limitations related thereto, as required by claim 1.

And since Ishii does not teach or suggest the subnet as required by claim 1, Ishii also cannot teach or suggest "simultaneous call means for transmitting a call signal to a broadcast address corresponding to said subnet..." as required by claim 1.

For these reasons, Ishii cannot anticipate amended claim 1 because Ishii does not teach or suggest all the limitations of amended claim 1. Withdrawal of the rejection and allowance of claim 1 is respectfully requested.

Claims 2-4 depend directly or indirectly from claim 1 and are therefore patentable for at least the same reasons as amended claim 1. Withdrawal of the rejection and allowance of amended claims 2-4 is respectfully requested.

Claim 5 requires the "mobile station device" and "base station device" as discussed with reference to amended claim 1, and is thus allowable for at least the same reasons as claim 1 discussed above. Withdrawal of the rejection and allowance of claim 5 is respectfully requested.

New claim 6 depends from claim 5 and is thus allowable at least the same reasons as claim 5.

Ishii also does not anticipate new claim 6 recites step of "storing a mobile station device specifying number of the mobile station device and the address of the subnet, and that the mobile station device specifying number and the subnet being in association with each other upon receiving the registration request." Thus, one aspect for claims 5 and 6 has a mobile station device (such as a mobile phone) issuing a position registration request to the base station device, which allows the base station device to operate to store the telephone number of the mobile phone, the IP address of the base station device, and their association. Since the mobile station device is a mobile device, it can issue a position registration request to a new base station device when entering the space controlled by the new base station device. And since the storing process is operated by the base station device, the mobile station device needs not know how and where each base station device stores the information. The present invention as recited by claims 5 and 6 thus allows the mobile station device greater freedom to roam and operates on different base station device systems. In contrast, Ishii teaches a system where endpoints itself, and not the base station device, operates to register and store the identification "nick" and the associated router with a gatekeeper (see Ishii col. 3, lines 57-67 teaching that each endpoint needs to know the ITU-T H.323 specification to know where and how to register with the gatekeeper). Ishii thus allows very limited mobility for the mobile station device, and the advantages of the present invention are not seen to flow from Ishii.

For the above reasons, the withdrawal of the 102(b) rejections of claims 1-5 and the allowance of claims 1-6 is respectfully requested.

CONCLUSION

In view of the foregoing, it is respectfully submitted that the application is in condition for allowance. Reexamination and reconsideration of the application, as amended, are requested.

If for any reason the Examiner finds the application other than in condition for allowance, the Examiner is requested to call the undersigned attorney at the Los Angeles, California telephone number (310) 785-4600 to discuss the steps necessary for placing the application in condition for allowance.

If there are any fees due in connection with the filing of this response, please charge the fees to our Deposit Account No. 50-1314.

Respectfully submitted,
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